

Appendix E

Examples of FOSS Documentation

Example Documentation for a Rating of “5” (Extremely Effective) on Measure 1 – Concern Identification

This team was extremely thorough and organized in their data gathering activities and extremely effective in identifying concerns from the data collected. They seemed particularly skilled in sifting through all of their observations to identify those that were relevant to the task. While they did not review complaint investigations off-site or follow up on one of the pieces of information requested, these lapses were more than offset by the excellence of their other activities. Onsite monitoring and limited independent fact-finding revealed that there were no concerns missed due to these lapses. The team’s sharing of information on an ongoing basis was instrumental in the excellence of their concern identification.

More specifically:

- Prior to the start of the on-site survey, the team reviewed the off-site data and set up a plan for data collection that covered all potential concerns in each area of the facility. They also set up a tentative time for a 10-minute meeting to ensure that they were collecting all necessary information and to share new, relevant information.
- This meeting was held, and alterations were made to the plan for the Initial Tour to focus on two possible new concerns.
- Periodic sharing of data/information occurred formally and informally throughout the survey. Team members looked for each other if they believed that they had new information to share. This sharing allowed all team members to be alert to all concerns.

Example Documentation for a Rating of “3” (Satisfactory) on Measure 1 – Concern Identification

The SA Team did a satisfactory job in that they identified concerns with adverse impact on residents and many of the other facility concerns. While they did not identify several potentially significant concerns that the RO Evaluator noticed, none of these concerns was determined to have an adverse impact on residents.

During Phase 2, the SA Surveyors were not as successful in identifying new areas of concern that were apparent in the facility and that were identified by the RO Evaluator. More specifically:

- The SA Team did not identify or fully explore two issues – the use of side rails, and the large number of residents eating in their rooms.
- The Team identified physical restraints as a concern as part of Phase 1 and Phase 2 sample selection. However, as manifest in Team discussions, their definition of physical restraints did not include bedside rails.
- Over the five days of the survey, the RO Evaluator noticed that approximately 81% of the residents were eating their meals in their rooms, and that eight of the ten residents in the Phase 1 sample were eating all of their meals in their rooms.

In identifying concerns, the SA Team did not always share information among themselves.

Example Documentation for a Rating of “2” (Less than Satisfactory) on Measure 2 – Sample Selection

The team was less than satisfactory in their sample selection in both Phase 1 and Phase 2. Because they did not look beyond the obvious in selecting the sample, the sample reflected only easily recognized problems and did not provide information to validate or invalidate complex concerns, some of which were chosen off-site.

In addition, several sample selection criteria were not met, and the inadequacy of sample selection had a negative impact on the team’s ability to identify deficiencies.

More specifically:

- The sample selection was not optimal for confirming or validating concerns by investigating them for possible deficient practice. One resident (Resident #8) was substituted for another resident who did not have any of the SA Team’s identified concerns, and only six (rather than seven) residents were included for the WHP review (Residents #1, 3, 5, 15, 16, 17).
- The team did not include residents with restraints in their sample. The team was thus unable to investigate this concern area, which could have a major impact on the residents’ quality of care and life. RO limited independent fact-finding consisting of multiple observations revealed several residents in restraints, and the multiple types of restraints observed was cause for concern.
- During the Phase 2 sampling meeting, because the team had no new information or concerns, they chose additional residents to continue to evaluate their current concerns. They did not discuss the need to make sure that they had residents who would meet all criteria for the sample selection, and the final sample did not include any resident at risk of dehydration, any new admissions (there were five), or any closed record reviews.

The incomplete sample selection put the team at risk for missing significant deficient care practices.

Example Documentation for a Rating of “1” (Much Less than Satisfactory) on Measure 4 – Kitchen/Food Service Investigation

The kitchen/food service investigation was not reflective of the extent and magnitude of deficient practice within the facility, was not sufficient to confirm or invalidate concerns, and was not sufficient for making deficiency determinations. More specifically:

- The Team did not investigate sufficiently to determine whether the evening meal that was about to be served had been adequately prepared. The chili had undercooked ground beef mixed into it, and the final temperature at the steam table was only 101 degrees F. The chili sat on the steam table for two hours prior to the meal service. When the facility realized that the chili was not at the proper 140 degrees F holding temperature, they reheated a partial batch in the microwave to 140 degrees F. The SA Team took no other temperatures of the food and did not investigate how the chili had been prepared. However, the RO Evaluator did limited independent fact-finding and determined that (1) according to the recipe, the ground beef should have been browned and should have reached a temperature of 155 degrees F, and (2) the facility had no functional thermometers in the kitchen that would have allowed staff to determine the temperature of the cooked chili. Given the 15 degree difference between the temperature the meat should have reached and the temperature it did reach, and the length of time the chili sat on the steam table at minimal temperatures, the RO Evaluator was concerned about the potential for food-borne illness and about possible Immediate Jeopardy.
- During the kitchen tour, the Team had not observed a large roast thawing in the walk-in that had dripped blood onto the shredded cabbage stored on a wire shelf below it. During the noon meal preparation, the cook used the shredded cabbage in the preparation of cole slaw and served it at room temperature.
- The Team did not ask or observe how the facility insures the proper sanitizing of pots and pans in the three-compartment sink; in addition, they were reluctant to have the facility demonstrate how they ensure proper sanitizing of dishes – whether by machine or sink methods.
- The RO Evaluator observed that the kitchen staff were not wearing hair restraints.

Example Documentation for a Rating of “4” (Very Effective) on Measure 5 – Medications Investigation

This team’s information collection was organized and followed the Medication Pass Protocol with minor deviations that did not limit their ability to determine the extent and magnitude of possible deficient practice in the facility. ALL of the information collected was not corroborated with a variety of sources, but this did not keep the team from correctly determining the facility’s compliance with requirements.

- The investigation was not comprehensive because one of the six medications given to one resident on the ‘B’ Hall and one of the four medications given to a resident on the ‘A’ Hall were dispensed in a different route than was documented on the Medication Administration Record, and the SA Team did not identify this discrepancy. When the RO Evaluator checked the medical record, he determined that the route of administration was correct and that the documentation of the route on the Medication Administration Record was incorrect.
- The SA Team used the probes and definitions to assist them with questions during reconciliation. The Team was also very alert to the environment and shared observations of Residents #4 and #6 with their teammates to help validate other concerns being investigated.